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### 13.0 CONDUCT OF OPERATIONS

#### 13.1 ORGANIZATIONAL STRUCTURE

##### 13.1.1 Corporate Management and Technical Support Organization

EGC's corporate organization and its functions and responsibilities are described in Section 1.0 of Quality Assurance Program Topical Report NO-AA-10<sup>[1]</sup> as revised and filed with the NRC. Organizational charts within this report reflect the current corporate structure and the departments which provide technical support for operation and backup support. Where appropriate, these services are provided by outside groups through contractual agreements.

##### 13.1.2 Plant Operating Organization

The overall organization of Dresden Station is in accordance with Chapter 1 of Quality Assurance Program Topical Report NO-AA-10<sup>[1]</sup> which describes the line of responsibility from the Chairman and Chief Executive Officer down through the station staff.

##### 13.1.3 Plant Personnel Responsibility and Authority

The basic job functions of Plant positions are described in QA Topical Report NO-AA-10<sup>[1]</sup> and Station Administrative Procedures.

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##### 13.1.5 Deleted

##### 13.1.6 Deleted

##### 13.1.7 Operating Shift Crews

Minimum shift manning requirements are listed in Technical Specification Section 5.2 and in the E-Plan. |

### 13.1.8 Qualifications of Nuclear Plant Personnel

The station positions requiring possession of an SRO License are described in Section 5 of the Technical Specifications. |

Qualifications of the station management and operating staff meet minimum acceptable levels as described in ANSI N18.1-1971, with exceptions and clarifications as noted in Section 5 of the Technical Specifications. |

### 13.1.9 References

1. Quality Assurance Program Topical Report NO-AA-10, "Quality Assurance Program for Nuclear Generating Stations," (current revision). |

## 13.2 TRAINING

### 13.2.1 Plant Training Programs

Dresden Nuclear Station provides training formulated to develop and maintain an organization qualified to operate, maintain, and support the facility in a safe and reliable manner. Achievement of this goal is based on a philosophy of providing training developed from a systems approach to training (SAT). This philosophy is consistent with both Nuclear Regulatory Commission (NRC) requirements 10 CFR parts 50 and 55, as well as the Institute of Nuclear Power Operations (INPO) recommendations for the accreditation of training programs by the National Academy of Nuclear Training. Program descriptions are contained in sections 13.2.1.1 and 13.2.1.2.

Retraining and replacement training of station personnel is conducted in accordance with Technical Specification Section 5.3 Unit Staff Qualifications. The frequency of retraining and continuing training programs are determined by following the SAT-based training process.

#### 13.2.1.1 Training Programs for Licensed Personnel

##### 13.2.1.1.1 Replacement License Training

Replacement license training will provide SAT-based training to reactor operator (RO) and senior reactor operator (SRO) candidates in accordance with 10 CFR 55. Replacement license training will comply with SAT-based training requirements by maintaining accreditation.

##### 13.2.1.1.2 License Operator Requalification Training

License operator requalification training will provide SAT-based training to ROs and SROs in accordance with 10 CFR 55. License operator requalification training will comply with SAT-based training requirements by maintaining accreditation.

##### 13.2.1.1.3 Simulator Training

ROs and SROs may perform control manipulations on the simulator required as part of the training in section 13.2.1.1.1 and 13.2.1.1.2. Training will maintain a certified simulator in accordance with the provisions in 10 CFR 55.

#### 13.2.1.1.4 Training of Licensed Supervisor

The shift supervisor training program will comply with the SAT-based training requirements and consists of training in those administrative duty areas above and beyond licensed duties.

#### 13.2.1.1.5 Training for Shift Technical Advisors

Shift Technical Advisors not meeting the dual-role SRO/STA requirements as described in section 13.2.1.1, will be trained and qualified in accordance with Option 2 of the Commission Policy Statement on Engineering Expertise (50 FR 43621 October 28, 1985). Shift technical advisor training will comply with the SAT-based training requirements.

#### 13.2.1.2 Training Programs for Nonlicensed Personnel

##### 13.2.1.2.1 Training for Mechanical Maintenance Personnel

Mechanical maintenance training will provide SAT-based training to mechanical maintenance personnel in accordance with 10 CFR 50.120. Mechanical maintenance training will comply with the SAT-based training requirements by maintaining accreditation.

##### 13.2.1.2.2 Training for Electrical Maintenance Personnel

Electrical maintenance training will provide SAT-based training to electrical maintenance personnel in accordance with 10 CFR 50.120. Electrical maintenance training will comply with the SAT-based training requirements by maintaining accreditation.

##### 13.2.1.2.3 Training for Instrument Maintenance Personnel

Instrument maintenance training will provide SAT-based training to instrument maintenance personnel in accordance with 10 CFR 50.120. Instrument maintenance training will comply with the SAT-based training requirements by maintaining accreditation.

##### 13.2.1.2.4 Training for Radiation Protection Personnel

Radiation protection training will provide SAT-based training to radiation protection personnel in accordance with 10 CFR 50.120. Radiation protection training will comply with the SAT-based training requirements by maintaining accreditation.



#### 13.2.1.2.5 Training for Chemistry Personnel

Chemistry training will provide SAT-based training to chemistry personnel in accordance with 10 CFR 50.120. Chemistry training will comply with the SAT-based training requirements by maintaining accreditation.

#### 13.2.1.2.6 Training for Non-licensed Operators

Non-licensed operator training will provide SAT-based training to non-licensed operator personnel in accordance with 10 CFR 50.120. Non-licensed operator training will comply with the SAT-based training requirements by maintaining accreditation.

#### 13.2.1.2.7 Training for Engineering Support Personnel

Engineering support training will provide SAT-based training to engineering support staff in accordance with 10 CFR 50.120. Engineering support training will comply with the SAT-based training requirements by maintaining accreditation.

#### 13.2.1.2.8 Training for Fuel Handlers

Fuel Handler Training ensures that Fuel Handlers are adequately trained in the area of systems, components, and task performances required to fulfill the duties and responsibilities of that position. Fuel handler training will provide SAT-based training to fuel handler personnel.

#### 13.2.1.2.9 Training for Emergency Preparedness Personnel

Emergency Preparedness (EP) Training is required for all designated response personnel who may be called upon to assist in an emergency. Station personnel who could be affected by an emergency are provided with training on the Emergency Plan (E-Plan) in order to provide for health and safety of the public, including station employees, and to limit damage to the facility and property. Emergency Preparedness Training typically consist of the following topics:

- A. Generic E-Plan training
- B. Site-specific E-Plan training
- C. Emergency Plan Implementing Procedures
- D. Operating Experiences

### 13.2.1.3 Nuclear General Employee Training

13.2.1.3.1 All employees (and others) who require unescorted access to the Protected Area of the station will receive training in the following areas:

- a. General description of plant and facilities
- b. Emergency Plan procedures
- c. Fire Protection Program and Procedures
- d. Security Requirements and Practices
- e. Safety Program
- f. Quality Assurance Program
- g. Radiological Protection Program

13.2.1.3.2 All employees (and others) who have unescorted access to Radiation Controlled Areas of the station will receive in-depth instruction in all aspects of radiation protection and, as required, respiratory protection. Subject material will include but will not be limited to the following:

- a. Handling radioactive material
- b. Controls and access requirements
- c. Biological effects of ionizing radiation

13.2.1.3.3 Some employees receive, as part of their specialty training a general plant information course. This course consist of overall plant description, thermodynamic fundamentals, nuclear physics fundamentals, and plant systems fundamentals.

13.2.1.3.4 Review of appropriate department and station procedures are specified in department specialty training programs.

### 13.2.1.4 Fire Brigade Training

A training program for the fire brigade is maintained under the direction of Operating Engineer and meets or exceeds the requirements of Section 27 of the National Fire Protection Association (NFPA) Code - 1975, except for the fire brigade training sessions which are held at least quarterly.

### 13.2.2 Replacement and Retraining

#### 13.2.2.1 Licensed Operators - Requalification Training

NOTE: All replacement and retraining are embedded within the accredited programs as described in sections 13.2.1.1 and 13.2.1.2.

13.2.3 Applicable NRC Documents

The following is a list of documents referenced in preparation of the Dresden training programs:

- a. 10 CFR 50
- b. 10 CFR 55
- c. 10 CFR 19
- d. Generic Letter 87-07
- e. Regulatory Guide 1.120
- f. Regulatory Guide 1.8
- g. Regulatory Guide 8.2
- h. Regulatory Guide 8.8
- i. Regulatory Guide 8.10
- j. Regulatory Guide 8.13
- k. NUREG - 0737
- l. 50 FR 43621, Option 2

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Table 13.2-1

UNIT 2 PERSONNEL TRAINING

Dresden Title	Activity						
	F	BWRT	ED	OP	ST	OJ	OS
		X	X	X			
Plant Supt.		X	X	X	X	X	X
Ass't. Supt.		X	X	X	X	X	X
Op. Engr.		X	X	X	X	X	X
Shift Engr. & Train. Supv.	X	X	X	X	X	X	X
Startup & Shift Foreman	X	X	X	X	X	X	X
NSO	X		X	X	X	X	X
Equip. Oper.	X		X	X	X	X	X
Equip Att.	X		X	X		X	X
Supv. Engr.		X	X	X			X
Thermal Engr.		X	X	X			X
Instr. Engr.		X	X	X			X
Rad. Chem. Engr.		X	X	X			X
Maint. Engr. & Master Mech.		X	X	X			X
Maint. Foreman		X	X	X			X
Fuel Forman	X	X	X	X			X
Other plant personnel	X		X			X	X

F - Fundamental Courses  
 ED - Equipment Description Course  
 ST - Simulator Training  
 OS - On Site Training

BWRT - Boiling Water Reactor  
 Technology Course  
 OP - Operating Procedure Course  
 OJ - On the Job BWR Training

### 13.3 EMERGENCY PLANNING

An Emergency Plan (E-Plan) has been developed which considers the consequences of radiological and non-radiological emergencies. The E-Plan provides for the protection of the health and safety of the public, including EGC employees, the limitation of damage to facilities and property, and the restoration of affected facilities in the event of an emergency. The E-Plan includes a site specific annex which contains additional information and guidance specific to each nuclear station.

The E-Plan describes the emergency organization, including assignments of authority and responsibility. The E-Plan provides for detection and evaluation of emergency situations and discusses protective measures, communications, coordination and notification of governmental authorities, document review and control, emergency preparedness assessment, and training of the participating personnel. Drills and Exercises to ensure readiness on the part of plant personnel are defined and described within the E-Plan.

#### 13.3.1 References

1. Exelon Nuclear Radiological Emergency Plan (current revision).
2. Exelon Nuclear Radiological Emergency Plan Annex, Dresden Station (current revision).

#### 13.4 REVIEW AND AUDIT

Review and Investigative Functions (committees) are established in accordance with the Quality Assurance Program. These functions include the Independent Technical Review, Plant Operations Review Committee, and the Nuclear Safety Review Board. Station Audits are performed as specified in the Quality Assurance Program described in Chapter 17.

In the event that a safety limit is exceeded, the reactor is shut down in accordance with the Technical Specifications and the conditions of shutdown are promptly reported to the Dresden Station Site Vice President or his designated alternate. Reactor operation is not resumed until authorized by the NRC. The incident receives onsite and offsite investigations and reviews pursuant to the Technical Specifications. For each occurrence, a separate report is submitted to the NRC as required by Technical Specifications and 10 CFR 50.73.

Any reportable occurrence is promptly reported to the Site Vice President or his designated alternate. Personnel performing the onsite review and investigative function will review investigation results and prepare a report covering the evaluation and recommendations to prevent recurrence. A separate report for each reportable occurrence is submitted to the NRC as required by Technical Specifications and 10 CFR 50.73.

##### 13.4.1 Plant Operations Review Committee

Personnel participating on the Plant Operations Review Committee are responsible for reviewing a variety of activities and documents as specified in the Quality Assurance Program. In accordance with Quality Assurance Program, certain of these reviews are reviewed by the Nuclear Safety Review Board.

##### 13.4.2 Nuclear Safety Review Board

Personnel participating on the Nuclear Safety Review Board are responsible for reviewing a variety of documents as specified in the Quality Assurance Program.

### 13.5 PLANT PROCEDURES

The procedure manuals for Dresden Units 2 and 3 provide procedures and surveillances for administration, operation, and maintenance of the facility. Procedures and surveillances are reviewed periodically and revised as necessary in light of operating experience and plant modifications. Station procedure designations and categories are shown in Table 13.5-1.

Station procedures are identified by discipline and by departmental responsibility. Descriptions of the types of departmental procedures and the purposes for which they are implemented are described in this section.

Procedures call for suspension of any potentially unsafe operation and for investigation by station management of any incident resulting in unsafe operation. Appropriate authorities will be notified, and existing procedures will be changed or new procedures added to prevent a recurrence of the incident or occurrence of similar incidents.

With only a few exceptions, acronyms for procedure identification normally begin with the letter "D" for Dresden Station.

#### 13.5.1 Administrative Procedures

Administrative Procedures describe the station organization and position responsibilities, establish station policy, supplement the requirements and procedures of the Quality Assurance Topical Report, implement the requirements of the Technical Specifications, and supplement the electronic work control system (EWCS).

Administrative procedures shall be established, implemented, and maintained to limit the working hours of Facility Staff who perform safety related functions; e.g., Senior Reactor Operators, Reactor Operators, Health Physicists, Auxiliary Operators, and key maintenance personnel.

Administrative controls and managerial procedures assure that required record keeping, review of unit operation, and appropriate reporting are performed.

The administrative controls specify the administrative organizations and functions which provide for proper operation of the unit, including actions to be taken in the event prescribed limits are exceeded.

##### 13.5.1.1 Conformance with Federal Guidelines

Dresden Station procedures are written to conform to applicable federal guidelines. The contents of the procedure manuals follow Appendix A of Regulatory Guide 1.33 (Revision 2) and ANSI N18.7-1972 requirements.

##### 13.5.1.2 Preparation of Procedures

Detailed station procedures (i.e., plant procedures), administrative procedures, and safety-related operating procedures are prepared by members of the station management staff or by personnel whom they designate. The Technical

Specification provides a list of items for which written procedures are required to be established, implemented, and maintained. Planned safety-related operations are conducted in accordance with detailed station procedures.

The station Plant Operations Review Committee reviews applicable administrative procedures and emergency operating procedures, as required by the Quality Assurance Program.

Technical review and approval of procedures which affect nuclear safety (and changes thereto) are carried out per the requirements of the Quality Assurance Program.

All procedures described in this section are authorized by appropriate station management personnel before being implemented.

#### 13.5.1.3 Procedures

Brief descriptions of selected station administrative procedures which control specific tasks are provided in the following subsections. The descriptions of station positions, responsibilities, and qualification requirements are given in Section 13.1.

##### 13.5.1.3.1 Daily Orders and Operating Orders

Written orders are issued by the station to promulgate instructions and information to the operation and maintenance crews. These orders are issued as Daily Orders and Operating Orders. Operating Orders contain primarily administrative direction and are not a substitute of permanent or special procedures. A Daily Order cannot supersede any approved Operating Order or procedure.

##### 13.5.1.3.2 Equipment Control

Equipment control procedures provide for the necessary control of equipment to maintain plant equipment and personnel safety and to avoid unauthorized operation of equipment. These procedures provide a method to control and maintain labeling to secure and identify equipment. They also describe the criteria for the selection of Operations Department-controlled equipment and valves which are to be locked. The locking of equipment and valves provides assurance that the components will be operated only by authorized personnel performing required activities.

##### 13.5.1.3.3 Control of Maintenance and Modifications

Control of maintenance and modifications is provided for in the Quality Assurance Topical Report. Station administrative procedures have also been developed to control plant maintenance and modification activities.



#### 13.5.1.3.4 Master Surveillance Testing Schedule

A surveillance schedule prescribes the surveillance to be performed, the performance frequency as outlined in the Technical Specifications, and the departments assigned to perform the surveillance. This schedule is produced as part of the station surveillance and periodic task scheduling program. A computerized system for tracking surveillance tasks has also been developed to augment the existing system.

#### 13.5.1.3.5 Logbook Usage and Control

Procedures for logbook usage and control ensure that adequate documentation of various unit operations and conditions is maintained. The procedure provides detailed instructions for maintenance of records and narrative logbooks to ensure that day-to-day shift activities are properly documented.

#### 13.5.1.3.6 Temporary Changes to Procedures

Temporary Changes to procedures may be provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed and approved within 14 days of implementation.

### 13.5.2 Operating and Maintenance Procedures

The various operating and maintenance procedures that have been developed for Dresden Station are described in the following subsections.

#### 13.5.2.1 Operating Procedures

The procedures described in this section are performed primarily by or with the knowledge of licensed operators.

##### 13.5.2.1.1 System Operating Procedures

System Operating Procedures detail steps necessary for startup, operation, and shutdown of individual systems or subsystems as well as steps necessary to troubleshoot system problems. These procedures also detail actions required to correct abnormal conditions for which time is not an element of concern and for

which the basic question is not what action is required to correct the condition but rather how to accomplish a desired action or achieve a desired condition.

#### 13.5.2.1.2 General Operating Procedures

General Operating Procedures detail steps required to conduct unit startup and shutdown, actions to be taken following a reactor scram, steps essential for routine power changes, and guidance for control rod movement.

#### 13.5.2.1.3 General Abnormal Procedures

General Abnormal Procedures describe actions to be taken by personnel either in the control room or in the plant during accident conditions to preclude violation of Technical Specification safety limits, core damage, degradation of primary containment integrity, or a threat to the health and safety of the public. These procedures are oriented toward a symptomatic response rather than a scenario response to accident conditions.

#### 13.5.2.1.4 System Operating Abnormal Procedures

System Operating Abnormal Procedures describe actions to be taken during system transients (analyzed or expected) that require immediate operator actions to protect personnel and equipment or to avoid a plant transient. Immediate operator actions are those actions that can be performed from the control room and that must be accomplished within the first 2 or 3 minutes following initiation of a transient.

#### 13.5.2.1.5 Emergency Operating Procedures

Emergency Operating Procedures govern plant operation during conditions of uncertainty and prescribe actions to return the plant to a safe and stable condition. These procedures include incorporation of human factors principles, precision limits of installed instrumentation, consistent format of support procedures, and multi-disciplinary involvement and maintenance of DEOPs.

#### 13.5.2.1.6 Annunciator Procedures

Annunciator Procedures detail setpoints, automatic actions, and operator actions necessary for response to a condition annunciated at an alarm panel.

#### 13.5.2.1.7 Temporary Changes to Operating Procedures

Temporary changes to procedures are addressed in section 13.5.1.3.6.

#### 13.5.2.2 Other Procedures

This section describes certain other operating and maintenance procedures, including the general objectives and characteristics of each class of procedure.

##### 13.5.2.2.1 Radiation Protection Procedures

Radiation Protection Procedures detail steps necessary to comply with policies established by the Radiation Protection Department, operation and surveillance of radiation protection instrumentation, methods of conducting surveys and collecting samples, and steps necessary to meet Technical Specification and Code of Federal Regulation requirements.

##### 13.5.2.2.2 Emergency Plan Implementing Procedures

Emergency Plan Implementing Procedures detail the steps necessary to implement the Generating Station Emergency Plan.

##### 13.5.2.2.3 Instrument Procedures

Instrument Procedures detail control of instrument surveillance, steps for calibrations and checks performed, instrument maintenance performed during refueling outages, and control of instrument records.

##### 13.5.2.2.4 Chemistry Procedures

Chemistry procedures detail analyses and calibrations performed at the station, specifications and limitations for such analyses, and actions required if conditions are found to be outside specifications.

#### 13.5.2.2.5 Radiological Control Procedures

Radiological Control Procedures prescribe the methods and modes of operation and guidance for proper handling, transfer, storage, and packaging of radioactive waste materials resulting from plant operations.

#### 13.5.2.2.6 Maintenance Procedures

##### 13.5.2.2.6.1 Mechanical Maintenance Procedures

Mechanical maintenance Procedures govern maintenance of safety-related components, detail steps for complex mechanical maintenance activities, and detail steps for mechanical maintenance activities that are not performed at a fixed frequency.

Maintenance Procedures provide guidance for both electrical and mechanical repair personnel. Maintenance Procedures differ from Repair Manuals in that the repair manuals contain rigging suggestions, tool lists and supplementary information to vendor manuals. Repair manuals do not contain detailed step-by-step sequences. Consequently, repair manuals are not procedures, do not require review by the Plant Operations Review Committee, and are administratively controlled within the Maintenance Department.

##### 13.5.2.2.6.2 Electrical Maintenance Procedures

Electrical Maintenance Procedures govern electrical maintenance of safety-related components and detail steps for electrical maintenance activities not performed on a fixed frequency.

##### 13.5.2.2.6.3 Emergency Plan Maintenance Procedures

Emergency Plan Maintenance Procedures detail the steps necessary for station personnel to perform surveillance and maintenance activities on station Emergency Response Facilities to assure they are available to implement the Generating Station Emergency Plan.

##### 13.5.2.2.7 Warehouse Procedures

Warehouse Procedures control packaging, receiving, handling, and storage of items in the storeroom. They also control storage of safety-related and ASME-related materials, provide for preventive maintenance for items in storage, and provide for proper documentation.

#### 13.5.2.2.8 Security Procedures

Security Procedures (DSPs) detail the steps necessary to implement the Security Plan.

#### 13.5.2.2.9 Fuel Handling Procedures

Fuel Handling Procedures implement the nuclear procedures. They detail steps necessary to perform core alterations; to inspect, receive, and handle new fuel; to handle and ship spent fuel; to load, move and store fuel in casks for Dry Cask Storage; and to perform activities within the spent fuel pool, within the new fuel storage vault, and on the refueling floor.

#### 13.5.2.2.10 Fire Protection Procedures

Fire Protection Procedures detail operation of the fire protection systems.

#### 13.5.2.2.11 Safe Shutdown Procedures

Safe Shutdown Procedures are classified by specific procedure paths based upon location and extent of damage. They provide guidelines for bringing the reactor to a cold shutdown condition using a minimum number of components during severe fire conditions.

#### 13.5.2.2.12 High Radiation Sample Building Procedures

High Radiation Sample Building Procedures detail steps for obtaining normal and post-accident chemistry samples from the high radiation sample system.

#### 13.5.2.2.13 Technical Staff Procedures

Technical Staff Procedures establish programs dealing with technical concerns, detail the collection of data for required reports, and control the calibration of technical staff instrumentation.

#### 13.5.2.2.14 Contingency Procedures

Contingency Procedures detail the steps necessary to implement the safeguards contingency plan.

#### 13.5.2.2.15 Special Procedures

Special Procedures are temporary in nature. They serve one or more of the following purposes:

- A. To detail operation during specific and/or unique circumstances;
- B. To detail steps required to accomplish a task not immediately covered by permanently approved procedures;
- C. To verify steps or conditions such that a permanent procedure can be developed;
- D. To detail steps necessary to accomplish a specific and/or unique task;
- E. To detail steps necessary to accomplish an infrequently performed task or a task that is not expected to be repeated;
- F. To detail steps for troubleshooting a specific problem; and
- G. To detail steps necessary to accomplish preoperational testing and/or initial calibration of systems and/or equipment when not covered by a modification procedure, work package instruction, or a permanently approved procedure.
- H. To detail steps necessary to perform a test, experiment, modification test, or operability test.

Special Procedures that affect Nuclear Safety receive review by the Plant Operations Review Committee and Nuclear Safety Review Board. Although the procedure or steps of the procedure may be repeated as necessary to accomplish the task or purpose of the procedure, the Special Procedure may not be reused once the intent of the procedure has been achieved without subsequent review and approval under a new Special Procedure number. Except for outage-related procedures, a Special Procedure is not used for a time period in excess of 6 months. The level of detail should be consistent with the complexity, skill level, and acceptance criteria of the task to be performed.

#### 13.5.2.2.16 Metrology Procedures

Metrology Procedures detail specific methods/steps for the calibration of Measurement and Test Equipment (M&TE) traceable to nationally recognized standards. |

### 13.5.3 Surveillance Procedures

Surveillance procedures provide station surveillance and periodic task scheduling required for each department.

#### 13.5.3.1 Chemistry Surveillances

Chemistry Surveillances provide for scheduling of periodic checks, inspections, tests, analyses, periodic calibrations, preventive maintenance tasks that are expected to prevent malfunctioning of equipment, and tasks that satisfy commitments to documents (e.g., the Technical Specifications).



#### 13.5.3.2 Electrical Surveillances

Electrical Surveillances provide for verification of operability or performance characteristics of systems/equipment; performance of periodic checks, inspections, tests, and analyses; performance of periodic calibrations; performance of maintenance tasks that are expected to prevent malfunctioning of equipment; and compliance with commitments to documents (e.g., the Technical Specifications).

#### 13.5.3.3 Fire Protection Surveillances

Fire Protection Surveillances provide for verification of operability or performance characteristics of systems/equipment; performance of periodic checks, inspections, tests, and analyses; performance of periodic calibrations; and performance of maintenance tasks that are expected to prevent malfunctioning of equipment.

#### 13.5.3.4 Instrument Surveillance Procedures

Instrument Surveillance Procedures detail steps for regularly scheduled instrument surveillances and calibrations.

#### 13.5.3.5 Mechanical Surveillances

Mechanical Surveillances provide for verification of operability or performance characteristics of systems/equipment; performance of periodic checks, inspections, tests, and analyses; performance of periodic calibrations; performance of maintenance tasks that are expected to prevent malfunctioning of equipment; and compliance with commitments to documents (e.g., the Technical Specifications).

#### 13.5.3.6 System Operating Surveillance Procedures

System Operating Surveillance Procedures ensure the operability of systems required by Technical Specifications, detail steps for verifying operability of systems required for plant operation, and detail steps for checks that are required to be performed on a regularly scheduled frequency.

#### 13.5.3.7 Radiation Protection Surveillances

Radiation Protection Surveillances provide for scheduling of periodic checks, inspections, tests, and analyses; periodic calibrations; and maintenance tasks that are expected to prevent malfunctioning of equipment such as effluent and discharge monitors. These surveillances also schedule tasks that satisfy commitments to documents (e.g., Technical Specifications).

#### 13.5.3.8 Technical Staff Surveillance Procedures

Technical Staff Surveillance Procedures describe regularly scheduled surveillances that require engineering expertise to accomplish or that should be performed under the cognizance of an engineer.

#### 13.5.3.9 Non-Station Work Group Procedures

Non-station work group procedures are procedures which govern work performed at Dresden and which are either prepared by onsite contractors, by EGC departments located offsite, or are prepared by station personnel to address activities which are not controlled by station procedures (e.g., fire pre-plans). The station may use non-station work group procedures once they are reviewed in accordance with the applicable administrative procedure.

#### 13.5.4 Corporate Procedures

Corporate Procedures may be used in lieu of station Administrative procedures once they are reviewed and approved in accordance with the applicable administrative procedure.

Table 13.5-1

STATION PROCEDURE DESIGNATIONS AND CATEGORIES

Deleted

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13.6 SECURITY

EGC implements and maintains in effect all provisions of the NRC-approved physical security, guard training and qualification, and safeguards contingency plans for Dresden Station in accordance with the operating licenses. The plans are specified in the following documents, as revised and filed with the NRC:

- A. "Dresden Nuclear Power Station Security Plan,"
- B. "Dresden Nuclear Power Station Security Personnel Training and Qualification Plan,"  
and
- C. "Dresden Nuclear Power Station Safeguards Contingency Plan."

These plans meet the requirements of 10 CFR 73.55 and Part 73, Appendices B and C.

The security plan documents contain safeguards information protected under 10 CFR 73.21 and are, therefore, withheld from public disclosure. Some general information relating to security is presented in the following paragraphs.

The Site Vice President has the ultimate responsibility and authority for security at the Station. Below the Vice President, the management of the security organization is independent of the site management. Authority for administration of the security organization is delegated from the Security Director to the Station Security Administrator (see Section 13.1). The Station Security Administrator reports directly to the Security Director and maintains an information and coordinator channel to the Site Vice President.

Station access is controlled by station security in accordance with the Dresden security plan and Dresden administrative procedures.

The following area designations are used at the station:

- A. Unrestricted area: that area beyond the site property line.
- B. Owner Controlled Area: that area between the station security fence and the property boundary line.
- C. Unposted area: that area within the station security fence that is not part of a radiologically posted area.
- D. Radiologically posted areas: those areas posted as radiation areas, high radiation areas, radioactive materials areas, airborne radioactivity areas, or combinations thereof. Access to radiologically posted areas for all work is controlled in accordance with station radiation protection procedures.
- E. Protected area: that area within the owner-controlled area enclosed by a station security fence in which the main buildings are located. Access to the protected area is controlled.

- F. Vital area: any area within the protected area which contains vital equipment. Vital equipment is any plant equipment, system, or device whose failure or destruction could directly or indirectly endanger public health and safety by a release of radioactivity which could result in a total radiation dose in excess of the limits established by 10 CFR 100.11. Equipment or systems which would be required to function to protect public health and safety following such failure or destruction are also considered vital equipment. Security equipment is not considered vital equipment. All vital equipment is contained in vital areas.

Normal access to the protected area is through the gatehouse. Personnel entering the gatehouse are screened by security systems, e.g., explosive and firearms detectors. When necessary, personnel are given a pat-down search in accordance with the requirements of the Dresden security plan.

Final entry to the protected area is controlled by a computerized card reader in conjunction with a hand geometry reader system at the Main Access Facility (MAF). Movement within the protected area is controlled by a computerized card reader system.

Security personnel coordinate with Training and Radiation Protection Department personnel to ensure that applicable entry requirements are met.

### 13.7 RECORDS

Quality assurance records are retained to furnish evidence of activities affecting quality. These records are stored from the time of their creation or receipt until their ultimate disposal in a manner which meets the requirements of applicable standards, codes, and regulatory agencies with regard to maintenance, preservation, and protection of files.

Records may be in various forms such as logs, reports, drawings, or meeting minutes.

Records are kept in a manner convenient for review and retained for the period of time specified in Table 13.7-1. It also describes specific records within each type and specifies the minimum required retention period. Record types are briefly discussed in the following subsections.

Other records are retained in accordance with schedules established by NRC orders, Federal Power Commission regulations, and Illinois Commerce Commission regulations. The retention periods for these records are specified in Dresden's Records Retention Schedule.

#### 13.7.1 Control Room Records

Operating Logs are reviewed and maintained in accordance with approved administrative programs. |

#### 13.7.2 Plant Operation Records

Plant operation records provide pertinent information on the history of unit power production, operational excursions, operational testing, and other quality activities. For example, records of normal plant operation include notation of power levels and periods of operation at each power level.

#### 13.7.3 Procedure Changes

Records of changes to procedures required by the Quality Assurance Topical Report NO-AA-10 as well as other procedures which affect nuclear safety, are retained.

#### 13.7.4 Review Committee Transactions

Records of review committee transactions include minutes of meetings and results of reviews performed by the Plant Operations Review Committee and Nuclear Safety Review Board.

#### 13.7.5 Radiological and Chemical Records

Included in this category of records are the occupational radiation exposure records for all plant personnel, including contractors and plant visitors, in accordance with 10 CFR 20, as well as radiation surveys, offsite environmental monitoring records, and others as noted in Table 13.7-1.

#### 13.7.6 Maintenance Records

This category includes records of maintenance and activities (substitution, inspection, and/or repair) for principal equipment pertaining to nuclear safety and the reasons for the maintenance. It also includes records of periodic checks, inspections, calibrations, and/or corrective actions (if any) performed in accordance with Technical Specification surveillance requirements. These records are maintained by the Maintenance Superintendent.

#### 13.7.7 Records of Facility Description and Evaluation

Records of facility description and evaluation include drawings, descriptions of plant changes, evaluations performed in accordance with 10 CFR 50.59, and records of environmental qualification.

#### 13.7.8 Personnel Records

Personnel records address the qualification, experience, training, and retraining of individual staff members.

Table 13.7-1  
REQUIREMENTS FOR RECORD RETENTION<sup>(a)</sup>

<u>Record Type</u>	<u>Record Description</u>	<u>Minimum Retention Period</u>
Control room records	Shift Engineers' logs	5 years
Plant operation records	Normal plant operation	5 years
	Reportable events	5 years
	Safety limit events	5 years
	Reactor coolant system inservice inspections	Life of plant
	Transient or operational cycling of life-limited components	Life of plant
	Physics tests and other tests pertaining to nuclear safety	5 years
Procedure changes	Changes to procedures as required by Quality Assurance Topical Report NO-AA-10	5 years
Review committee transactions	Reviews by Plant Operations Review Committee	Life of plant
	Reviews by Nuclear Safety Review Board	Life of plant
Radiological records	Personnel exposure records	Life of plant
	Radioactivity in liquid and gaseous wastes released to the environment	Life of plant
	Plant radiation and contamination surveys	Life of plant
	Offsite environmental monitoring surveys	Life of plant



Table 13.7-1  
REQUIREMENTS FOR RECORD RETENTION<sup>(a)</sup>

<u>Record Type</u>	<u>Record Description</u>	<u>Minimum Retention Period</u>
	Radioactive material shipments	Life of plant
	Byproduct material inventory	5 years
	Source leak test results	5 years
	New and spent fuel inventory	Life of plant
	New and spent fuel assembly histories	Life of plant
Maintenance records	Substitution or replacement of principal equipment pertaining to nuclear safety	Life of plant
	Maintenance of principal equipment pertaining to nuclear safety	5 years
	Periodic checks and calibrations to meet Technical Specification surveillance requirements	5 years
Records of facility description and evaluation	Equipment changes or reviews of tests and experiments to comply with 10 CFR 50.59	5 years
	Changes to the plant as it is described in the SAR	Life of plant
	Plant drawings (updated, corrected, and as-built)	Life of plant
	Environmental qualification	Life of plant
Personnel records	Staff member qualifications, experience, training, and retraining	Life of plant

<sup>(a)</sup> Changes to this table must be made via the provisions of 10 CFR 50.54(a) until the record retention requirements are listed in the Exelon Nuclear QA Topical Report NO-AA-10.